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ACTION AND PROTECTION FOUNDATION
AND DÁNIEL BODNÁR

THE UNITED STATES DISTRICT COURT
IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

In the Matter of the Application of

ACTION AND PROTECTION
FOUNDATION; DÁNIEL BODNÁR

For an Order to Conduct Discovery for Use in a
Foreign Legal Proceeding pursuant to 28
U.S.C. § 1782.

Case No.: C 14-80076 EMC (LB)

**ACTION AND PROTECTION
FOUNDATION AND DANIEL
BODNAR'S STATUS CONFERENCE
STATEMENT : ORDER**

Date: March 27, 2014
Time: 11:00 a.m.
Place: Courtroom C – 15th Floor
Judge: Mag. Judge Laurel Beeler

ACTION AND PROTECTION FOUNDATION and DÁNIEL BODNÁR (“Applicants”) respectfully submit the following status conference statement in advance of the March 27, 2014 status conference concerning the Ex Parte Application for an Order Under 28 U.S.C. § 1782 for Issuance of Subpoenas to Bela Varga and Cloudflare Inc. for Taking of Depositions and Production of Documents for Use In a Foreign Proceeding and Criminal Investigations (the “Application”).

Applicants take no issue with the Court’s suggestion that Cloudflare Inc. and Bela Varga (collectively, the “Non-parties”) be served. In furtherance of the Court’s suggestion, Applicants propose the following:

Applicants shall endeavor to complete service on the Non-parties by April 1, 2014 and shall file a proof of service when service has been accomplished. Assuming service is accomplished by April 1, 2014, Applicants propose the following schedule for the Application:

Opposition brief (if any): filed on or before April 15, 2014;

Reply brief (if any): filed on or before April 22, 2014;

Hearing on application (if any): April 28, 2014 (or other date thereafter convenient to the Court).

Respectfully submitted,

FOX ROTHSCHILD LLP

Dated: March 25, 2014

/s/ Jack Praetzellis

JACK PRAETZELLIS

Attorneys for Applicants for Applicant

ACTION AND PROTECTION

FOUNDATION AND DÁNIEL BODNÁR

The court adopts the briefing schedule. Motion Hearing for Application set for May 8, 2014 at 9:30 a.m. Motion Hearing set for March 27, 2014 at 11:00 a.m. is VACATED.
Dated: March 26, 2014

